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Attorneys for Plaintiff MARK SNOOKAI

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 | MARK SNOOKAI, an individual.

) CASE NO.: 2:23-cv-6302-HDV-AJR

13 Plaintiff,

) DECLARATION OF OLIVIA FLECHSIG
) IN SUPPORT OF PLAINTIFF MARK
) SNOOKAL'S MOTION IN LIMINE NO. 3
) – MOTION TO EXCLUDE REFERENCE
) TO THIRD-PARTY MEDICAL
) INFORMATION

16 CHEVRON USA, INC., a California
17 Corporation, and DOES 1 through 10,
inclusive.

) [Filed concurrently with Plaintiff's Notice of
) Motion and Motion in Limine No. 3 – Motion
) to Exclude Reference to Third Party Medical
) Information [Proposed] Order Granting
) Plaintiff's Motion in Limine No. 3]

Defendants

-) District Judge: Hon. Hernan D. Vera
-) Magistrate Judge: Hon. A. Joel Richlin
-) Action Filed: August 3, 2023
-) Trial Date: August 19, 2025

-) Hearing Date: July 24, 2025
-) Hearing Time: 10:00 a.m.
-) Courtroom: 5B

DECLARATION OF OLIVIA FLECHSIG

I, Olivia Flechsig, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am an associate with the law firm Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal (“Plaintiff” or “Mr. Snookal”). As such, I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I make this declaration in support of Plaintiff's Motion in Limine No. 3 - Motion to Exclude Reference to Third Party Medical Information.

3. I have reviewed the documents in this case, and I am not aware of any third-party medical information in this record that pertains to Mr. Snookal having a family history of heart disease or having suffered a severe cardiac event.

4. I am informed that on May 10, 2024, counsel for Defendant Chevron USA, Inc. took the deposition of Mr. Snookal. I am in possession of a certified copy of same. Attached hereto as **Exhibit 1** is a true and correct copy of relevant excerpts of Mr. Snookal's deposition.

5. On June 17, 2025, Dolores Y. Leal and I met and conferred with counsel for Defendant, Tracey Kennedy and Robert Mussig, via Zoom videoconference regarding the topics required by Local Rule 16-2, including Plaintiff's anticipated motions in limine. Further to this call, on June 18, 2025, I sent a meet and confer email to Ms. Kennedy and Mr. Mussig to further meet and confer.

6. On June 23, 2025, Mr. Mussig responded to my meet and confer email. Regarding the content of this motion in limine, Mr. Mussig wrote, *inter alia*, that “Mr. Snookal’s family history of mental health issues certainly would be relevant to his claimed emotional distress damages.” Mr. Mussig then listed various mental health diagnoses of Mr. Snookal’s family members, including those of Mr. Snookal’s extended family members. He also referenced events which allegedly took place between approximately 15 – 51 years ago, including while Mr. Snookal was still in utero.

7. Out of respect for the privacy of the third parties referenced in Mr. Mussig's email, we do not wish to publicly disclose the information. However, we will be prepared to

1 lodge the information with the court *in camera* or under seal with leave from Court to do so.

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3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct, and that this Declaration was executed on July 1, 2025, at Los
5 Angeles, California.

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8 Olivia Flechsig
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